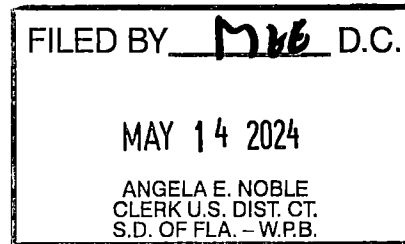


**KENNY ALEXANDRE**  
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Tamarac, FL 33321  
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954-588-1006

**May 10, 2024**

**JPMORGAN CHASE BANK, N.A.,**  
383 Madison Avenue,  
New York, New York 10179



**Subject: Adverse Action Notice Pursuant to the Fair Credit Reporting Act**

Dear JPMORGAN CHASE BANK, N.A.,

I am writing to express my serious concerns regarding recent adverse actions I have experienced while applying for credit with various institutions. This letter serves as an Adverse Action Notice as required under the Fair Credit Reporting Act (FCRA), 15 U.S.C. § 1681.

**BACKGROUND:**

I recently applied for credit with multiple institutions and, regrettably, my applications were denied based on information contained in my consumer report. Upon a thorough examination of my consumer report, it has come to my attention that inaccurate information has been reported.

**SPECIFIC VIOLATIONS:**

I believe that JPMORGAN CHASE BANK, N.A.'s reporting of inaccurate information is in violation of federal laws, including but not limited to, 15 U.S. Code § 1666B, 15 U.S. Code § 1666d, 15 U.S.C. § 1681(A)(3), (A)(4), and 15 U.S.C. § 6802. These violations have resulted in substantial harm, both financially and emotionally, as they have impacted my ability to secure credit from other institutions.

**REQUEST FOR CORRECTIVE ACTION:**

I am requesting that JPMORGAN CHASE BANK, N.A. takes immediate corrective action by removing the tradeline in question (4388 5400 7687 9963) from all credit bureaus.

**CLAIMS FOR RELIEF:**

1. Violation of 15 U.S. Code § 1666B: Inaccurate reporting.
2. Violation of 15 U.S. Code § 1666d: Erroneous creation of a credit balance.
3. Violation of 15 U.S.C. § 1681(A)(3): Inaccurate information reported to credit bureaus.
4. Violation of 15 U.S.C. § 1681(A)(4): Failure to conduct a reasonable investigation upon receiving notice of the dispute.
5. Violation of 15 U.S.C. § 6802: Failure to respect disclosures of personal information

**REQUESTED RELIEF:**

I am seeking the following relief:

1. A declaratory judgment affirming JPMORGAN CHASE BANK, N.A.'s violations of federal laws.
2. Injunctive relief mandating the immediate correction of my consumer report.
3. Compensatory damages in the amount of \$4000, covering financial losses, emotional distress, and court costs.

**REQUESTED ACCOUNT UPDATE:**

I specifically request that my consumer report is updated to reflect the removal of the tradeline in question (4388 5400 7687 9963) from all credit bureaus.

**JURY DEMAND:**

I reserve the right to demand a trial by jury on all issues so triable.

**PRAYER FOR RELIEF:**

I implore JPMORGAN CHASE BANK, N.A. to rectify the injustices perpetuated by promptly addressing the violations outlined above. Failure to do so may result in further legal action.

Please provide a written response within 30 days of receiving this letter, as required by the FCRA. I appreciate your prompt attention to this matter and look forward to a swift resolution.

Sincerely,



KENNY ALEXANDRE

UNITED STATES DISTRICT COURT [Southern District of Florida, Palm Beach County Division]

Kenny Alexandre, Plaintiff, v. JPMorgan Chase Bank, N.A., Defendant.

Case No:

INTRODUCTION: Kenny Alexandre, an adamant plaintiff, initiates this action against JPMorgan Chase Bank, N.A., the defendant, unveiling significant violations of federal laws governing credit transactions.

PARTIES:

1. Kenny Alexandre, a distinguished resident at 8321 NW 80 PLACE, Tamarac, FL 33321.
2. JPMorgan Chase Bank, N.A., located at 383 Madison Avenue, New York, New York 10179.

JURISDICTION AND VENUE: This Court holds jurisdiction under 28 U.S.C. § 1331, where the plaintiff asserts his rights under federal law. Venue is appropriately laid in the Southern District of Florida, Palm Beach County Division, as the defendant conducts its affairs within this jurisdiction.

FACTUAL BACKGROUND: JPMorgan Chase Bank, N.A., with blatant disregard for the Fair Credit Billing Act (FCBA) as outlined in 15 U.S. Code § 1666B, has erroneously reported late payments, creating financial turmoil and emotional distress for Mr. Kenny Alexandre. The defendant's actions have caused profound injustice.

CLAIMS FOR RELIEF:

1. Violation of 15 USC 1666B: JPMorgan Chase Bank, N.A.'s flagrant disregard for the Fair Credit Billing Act (FCBA) is evident in the inaccurate reporting of late payments, thereby violating 15 U.S. Code § 1666B. This statute mandates fair billing practices and prohibits the reporting of inaccurate information to credit bureaus. The defendant's negligent actions have further exacerbated the financial harm inflicted upon Mr. Alexandre.
2. Violation of 15 U.S. Code § 1666d: In addition, JPMorgan Chase Bank, N.A., in violation of 15 U.S. Code § 1666d, has erroneously reported a credit balance that, by law, should not have existed. This statute mandates that when a credit balance in excess of \$1 is created, the creditor shall credit the amount to the consumer account. The defendant's failure to comply with this statute adds an additional dimension to the plaintiff's grievances.
3. Violation of 15 U.S.C. § 1681(A)(3) and (A)(4): a. JPMorgan Chase Bank, N.A.'s disregard for the Fair Credit Reporting Act (FCRA) is apparent in the inaccurate information reported to credit bureaus, specifically pertaining to late payments, violating 15 U.S.C. § 1681(A)(3). b. The defendant failed to conduct a reasonable investigation upon receiving notice of the dispute, further violating 15 U.S.C. § 1681(A)(4).

4. Violation of 15 U.S.C. § 6802: a. JPMorgan Chase Bank, N.A.'s Failure to respect disclosures of personal information

REQUEST FOR RELIEF: The plaintiff, unwavering in the pursuit of justice, implores this Court for:

1. A declaratory judgment affirming the defendant's egregious violations of 15 U.S. Code § 1666B, 15 U.S. Code § 1666d, 15 U.S.C. § 1681(A)(3), (A)(4), and 15 U.S.C. § 6802.
2. Injunctive relief mandating the immediate removal of the tradeline associated with account number 4388540076879963 from all credit bureaus.
3. Compensatory damages in the amount of \$4000, inclusive of financial losses, emotional distress, and court costs.

REQUESTED ACCOUNT UPDATE: The plaintiff, Kenny Alexandre, specifically requests that all tradelines associated with account number 4388540076879963 be removed from his credit report.

JURY DEMAND: The plaintiff demands a trial by jury on all issues so triable, upholding the principles of fairness and justice.

PRAYER FOR RELIEF: In conclusion, the plaintiff, Kenny Alexandre, seeks this Court's intervention to rectify the profound injustices perpetuated by JPMorgan Chase Bank, N.A. The focus on 15 U.S. Code § 1666B, 15 U.S. Code § 1666d, 15 U.S.C. § 1681(A)(3), (A)(4), and 15 U.S.C. § 6802 exposes the defendant's egregious violations, and the plaintiff respectfully implores this Court to enter judgment in his favor, granting the requested relief, and meting out any further relief deemed just and proper.



KENNY ALEXANDRE